

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOSEPH SHOEMAKER and
RICHARD GINDIN, individually and
on behalf of all others similarly
situated,

Plaintiffs,

v.

**RICHARD ZEITLIN, AMERICAN
TECHNOLOGY SERVICES, LLC,
UNIFIED DATA SERVICES, LLC,
COMPLIANCE CONSULTANTS,
LLC, and JOHN DOES 1-10,**
corporate entities and individuals
presently unknown,

Defendants.

CASE NO. 1:21-cv-01668-CCC

Judge Christopher C. Conner

JOINT STIPULATION OF DISMISSAL

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs Joseph Shoemaker and Richard Gindin (“Plaintiffs”) and Defendants Richard Zeitlin, American Technology Services, LLC, Unified Data Services, LLC and Compliance Consultants, LLC (“Defendants”) by and through their undersigned counsel, stipulate and agree that the claims asserted by Plaintiffs on behalf of a putative class are hereby dismissed *without prejudice* and the claims asserted by Plaintiffs in their individual capacity are dismissed *with prejudice*, with each party

to bear their own costs and fees.

Dated: October 6, 2023

Respectfully submitted,

s/ Max S. Morgan

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Appearing pro hac vice

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2023, service was made on all Counsel of Record using the Court's ECF service.

/s Max S. Morgan
Max S. Morgan, Esq.